

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

----- X
JASON FREY, BRIANNA FREY, :
JACK CHENG, and WILLIAM SAPPE, :
: 21-CV-5334 (NSR)
Plaintiffs, : **NOTICE OF MOTION TO DISMISS**
: - against -
: KEVIN P. BRUEN, Acting Superintendent
of the New York State Police, in his
official capacity, NEW YORK CITY,
New York, and DERMOT SHEA, in his
official capacity as NYPD Commissioner,
: Defendants. :
----- X

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law in Support of Defendant's Motion to Dismiss dated November 17, 2021, and all other prior pleadings and proceedings herein, State Defendant Kevin Bruen, by his attorney, Letitia James, Attorney General of the State of New York, hereby move this Court before the Honorable Nelson S. Román, United States District Judge, for an Order pursuant to Rule 12(b)(1) of the Federal Rules of Civil Procedure, dismissing the Complaint (ECF Dkt. No. 1), and for such further relief as this Court deems just and proper.

Dated: New York, NY
November 17, 2021

LETITIA JAMES
Attorney General
State of New York
Attorney for Defendant Bruen
By:

/s/ Ian Ramage
Ian Ramage
Neil Shevlin

Assistant Attorneys General
28 Liberty Street, 18th Floor
New York, New York 10005
(212) 416-8659/8561
Ian.Ramage@ag.ny.gov
Neil.Shevlin@ag.ny.gov